IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re Chapter 11

Lordstown Motors Corp., et al., Case No. 23-10831 (MFW)

Debtors. (Jointly Administered)

Re: D.I. 321

NOTICE OF WITHDRAWAL OF "DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING DEBTORS TO FILE UNDER SEAL CERTAIN CONFIDENTIAL INFORMATION IN CONNECTION WITH THE DECLARATION OF DANIEL NINIVAGGI IN SUPPORT OF DEBTORS' OBJECTION TO FOXCONN'S MOTION TO DISMISS" [D.I. 321]

PLEASE TAKE NOTICE that, on August 24, 2023, the debtors and debtors in possession in the above-captioned cases (collectively, the "**Debtors**"), filed the *Debtors' Motion* for Entry of an Order Authorizing Debtors to File Under Seal Certain Confidential Information in Connection with the Declaration of Daniel Ninivaggi in Support of Debtors' Objection to Foxconn's Motion to Dismiss [D.I. 321] (the "**Motion to Seal**") with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that the Debtors hereby withdraw the Motion to Seal without prejudice.

[Remainder of page intentionally left blank.]

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Dated: August 28, 2023

Respectfully submitted,

/s/ Jason M. Madron

RICHARDS, LAYTON & FINGER, P.A.

Kevin Gross (No. 209)
Daniel J. DeFranceschi (No. 2732)
Paul N. Heath (No. 3704)
Amanda R. Steele (No. 5530)
Jason M. Madron (No. 4431)
James F. McCauley (No. 6991)
One Rodney Square
920 N. King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
gross@rlf.com
defranceschi@rlf.com

gross@rlf.com defranceschi@rlf.com heath@rlf.com steele@rlf.com madron@rlf.com

mccauley@rlf.com

Proposed Co-Counsel to Debtors and Debtors in Possession

WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*) Matthew C. Brown (admitted *pro hac vice*) Fan B. He (admitted *pro hac vice*) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700

Telephone: (305) 371-270 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com

Jason N. Zakia (admitted *pro hac vice*) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)
Doah Kim (admitted *pro hac vice*)
RJ Szuba (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
rkampfner@whitecase.com
doah.kim@whitecase.com
ri.szuba@whitecase.com

Co-Counsel to Debtors and Debtors in Possession